

## **Documentation of Land Use Plan Conformance and Determination of NEPA Adequacy (DNA)**

U.S. Department of the Interior  
Bureau of Land Management (BLM)  
Vermilion Cliffs National Monument  
Grand Staircase Escalante National Monument  
Arizona Strip Field Office - Kanab Field Office

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This worksheet is to be completed consistent with the 'Guidelines for Using the DNA Worksheet' located at the end of the worksheet. The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

A. **BLM Office:** AZ-120

**Lease/Serial/Case File No.** AZ-120-2005-0043

**Proposed Action Title/Type:** Special Recreation Permit for Circle Tours

**Location of Proposed Action:** Vermilion Cliffs National Monument, Arizona Strip Field Office public lands, Kanab Field Office public lands and Grand Staircase Escalante National Monument.

**Description of the Proposed Action:** Authorize a Special Recreation Permit for Circle Tours, Page, AZ. The permit would authorize the Circle Tours to conduct day hiking, overnight backpacking, vehicle tours, and trailhead shuttles.

The majority of trips would take place in the Vermilion Cliffs National Monument, and the remainder would take place on Arizona Strip Field Office and Kanab Field Office public lands. A few roads on the Grand Staircase Escalante National Monument would be used to access trailheads and other areas on the rim of the Paria Canyon – Vermilion Cliffs Wilderness.

This type of action would be typical for a commercial guide service offering hiking and backpacking trips, and vehicle tours. The applicant currently holds a valid SRP with the Glen Canyon National Recreation Area. The company adheres to Leave No Trace and Tread Lightly principles.

This permit would be issued for a period of three years. The applicant anticipates that the majority of guiding business will be in the Coyote Buttes South and Paria Canyon permit areas, and at places of interest along the House Rock Valley Road. The demand for trips onto the Paria Plateau and Cedar Mountain is currently low, but is expected to increase over the next couple of years.

On overnight backpacking trips in Paria Canyon, campsites would be located in previously established sites identified in the Paria Hikers Guide. Campsites used during overnight vehicle tours of the Paria Plateau have not been established because current demand for these trips is low. Such sites would most likely be near the rim of the Vermilion Cliffs in a scenic location.

If overnight tours on the Paria Plateau or the Kanab Creek Wilderness Area are scheduled, the preferred method for choosing a campsite is use an existing site that has seen previous overnight camping use. If the applicant wishes to use a new, undisturbed site, the location must be approved in advance by the BLM Recreation Planner. This means that the location information, in the form of GPS coordinates, must be submitted at least one week prior to the trip's scheduled starting date (see stipulations #60, 66).

Unless, otherwise specified, all trips are limited to a maximum of ten participants and two guides (see stipulation #62).

The following is a detailed list of trips the applicant would like to be permitted for:

**Day Hiking:**

1. Paria Canyon – Vermilion Cliffs Wilderness from Buckskin, Wire Pass, Middle Trail, Whitehouse, and Lee's Ferry trailheads.
2. Coyote Buttes South from the Paw Hole, Lone Tree, and Cottonwood Cove trailheads.
3. Arizona Trail from the Stateline trailhead and the Winter Road.
4. West Bench Pueblo public use site from BLM Road 1065.
5. Cedar Mountain and West Clark Bench from various points off Hwy 89.
6. Coyote Buttes North from Wire Pass and The Notch trailheads (Note: this area would not become valid until online permits for Coyote Buttes North are being operated under a lottery system).

**Overnight Backpacking:**

1. Paria Canyon – Vermilion Cliffs Wilderness from Buckskin, Wire Pass, Middle Trail, and Whitehouse trailheads.
2. Kanab Creek Wilderness in Hack Canyon from BLM Road 1123 and/or BLM Road 1006 (see map).

**Vehicle Tours:**

1. Honeymoon Trail from various points along BLM Road 1065.
2. Hack Canyon area from BLM Road 1006.
3. Condor Viewing Site and West Bench Pueblo from BLM Road 1065.
4. Cedar Mountain and West Clark Bench from various points off Hwy 89 (see map).
5. Paria Plateau from roads shown on map.

**Shuttles:**

1. Trailhead shuttles between the following trailheads: Buckskin Gulch, Wire Pass, Middle Trail, Whitehouse, and Lee's Ferry.

**Applicant (if any):** Circle Tours

**B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans**

LUP Name: Arizona Strip District Resource Management Plan  
Date Approved: Jan 1992 (ASFORMP)

LUP Name: Grand Staircase Escalante National Monument Management Plan  
Date Approved: Nov 1999 (GSENMMP)

LUP Name: Paria MFP (Kanab Field Office)  
Date Approved: 1981

Other document: Vermilion Resource Area Implementation Plan for the Arizona Strip Approved Resource Management Plan. (VRAIP)  
Date Approved: July 1992

Other document: Paria Canyon – Vermilion Cliffs Wilderness Management Plan  
Date Approved: Sept 1986 (PCVCWMP)

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

Paria MFP: R-2: Expand opportunities for visitor enjoyment and use of sightseeing attractions, consistent with resource capabilities and mandated protection requirements.

VRAIP: RR01: Consider all applications for special recreation permits - - - subject to the constraints of this plan and the environmental assessment for the proposed use.

VRAIP: RR03: Provide recreation settings where traditional, backcountry, extensive recreation activities such as camping, hunting, and sightseeing are possible and the experience opportunities for such activities are high.

PCVCWMP: Page 12, Commercial Use, Management Objective: Commercial use will be managed to allow outfitters and guides to meet public needs as appropriate when that use is consistent with the protection of the wilderness resource.

GSENMMP: OG-1: Outfitter and guide operations will be allowed throughout the Monument in compliance with the constraints of the zones and other Plan provisions.

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**C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.**

List by name and date all applicable NEPA documents that cover the proposed action.

EA No. AZ-931-93-001: Special Recreation Permits for Commercial Activities on Public Lands in Arizona

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**D. NEPA Adequacy Criteria**

**1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?**

X      Yes

No

The existing EA was written specifically for this type of recreational activity. While the EA applies to a large range of guided outdoor activities, hiking and backpacking are mentioned specifically in the introduction section of the document (page 1), and are analyzed in both of the alternatives.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?**

X      Yes

No

There are two alternatives analyzed in the existing EA—the proposed action and no action.

Under the proposed action, SRPs would be issued on a case-by-case basis. The analysis states that resource impacts would be minimal because the BLM would have the ability to approve, deny, or modify a proposed operation, as well as modify or add to the list of stipulations that commercial operators must comply with. This offers improved resource protection over the no action alternative.

The alternative to the proposed action would be to not issue a permit. The existing EA states that denial of permits could increase illegal guiding activity and may hinder the

BLM's ability to work with outfitters and monitor commercial activities. Unregulated activity could have greater resource impacts and create additional enforcement problems.

The range of alternatives analyzed in the existing EA are still valid under the current conditions and circumstances.

**3. Is existing analysis adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent U.S. Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?**

X      Yes

No

The only changes that have happened since the existing EA was issued is the designation of the Vermilion Cliffs National Monument in November of 2000, and the creation of the Fee Demonstration Project for the Paria Canyon – Vermilion Cliffs Wilderness in 1997. The Fee Demonstration Project has since become permanent and is now called the Federal Lands Recreation Enhancement Act (FLREA).

The proposed hiking and guiding activities are consistent with the monument proclamation, interim monument management guidance, and the fee program rules and regulations for Paria Canyon/Coyote Buttes as defined under FLREA.

**4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?**

X      Yes

No

Analysis methodologies for this type of activity have not changed since the existing EA was issued.

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**5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Do the existing NEPA documents analyze impacts related to the current proposed action at a level of specificity appropriate to the proposal (plan level, programmatic level, project level)?**

X      Yes

No

The environmental impacts of the current proposed action would be similar to non-commercial hiking and backpacking. These impacts are identical to those identified in the Environmental Impacts section (pages 5-8) of the existing EA. Therefore, the existing analyses are adequate for the proposed action.

**6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?**

X      Yes

No

In the Cumulative Impacts section (pages 8-9), the existing EA recognizes that backcountry recreation is increasing as the population increases, and that many visitors may choose to hire a guide to ease trip planning and enhance their backcountry experience.

The proposed action would not result in a significant visitation increase to public lands, because the majority of the trips proposed would take place in the Paria Canyon/Coyote Buttes fee areas, which are already constrained by rigid visitor use limits. There could be a slight increase of use on Cedar Mountain and the Paria Plateau, but these areas are remote, rugged, and difficult to access. Cumulative impacts would be minimal.

The cumulative impact analysis in the existing EA is still valid.

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**7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

X      Yes

No

The existing EA was widely distributed, including 550 copies to agencies, organizations, and individuals on the wilderness mailing list.

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**E. Interdisciplinary Analysis:** Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Resource Represented</u>
Gloria Benson	Native American Coordinator
Tom Christensen	Recreation, Kanab Field Office
Tom Folks	Recreation, Arizona Strip Field Office
Laurie Ford	Lands/Realty/Minerals, Arizona Strip Field Office
Becky Hammond	Vermilion Cliffs National Monument Manager
Michael Herder	Wildlife, Arizona Strip Field Office
John Herron	Cultural, Arizona Strip Field Office
Lee Hughes	Plants, Arizona Strip Field Office
Ray Klein	Law Enforcement, National Park Service
John Logsdon	Law Enforcement, Vermilion Cliffs National Monument
Linda Price	Standards and Guides, Arizona Strip Field Office
Bob Sandberg	Range, Arizona Strip Field Office
Rex Smart	Kanab Field Office Manager
Richard Spotts	Environmental Coordinator, Arizona Strip Field Office
Ron Wadsworth	Law Enforcement, Arizona Strip Field Office

**F. Mitigation Measures:** List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

See attached stipulations.

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## **CONCLUSIONS**

Based on the review documented above, I conclude that:

### **Plan Conformance:**

- X                      This proposal conforms to the applicable land use plan.
- This proposal does not conform to the applicable land use plan

### **Determination of NEPA Adequacy**

- X                      The existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.
- The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be

further considered.

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**Signature of the Responsible Official**

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**Date**